

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	No. 1:21-cr-10256-RWZ
)	
KINGSLEY R. CHIN,)	
ADITYA HUMAD, and)	
SPINEFRONTIER, INC.,)	
)	
Defendants)	

JOINT STATUS REPORT

The parties hereby file the following joint status report prepared in connection with the final status conference scheduled for December 13, 2022.

On December 1, 2022, counsel for defendants Kingsley Chin and SpineFrontier, Inc. filed his notice of withdrawal, D.E. 88, and successor counsel filed their notices of appearance, D.E. 86, 87. Prior counsel for Chin and SpineFrontier is currently on trial and, thus, has not yet provided his case file to new counsel.

1) Automatic Discovery

The government provided automatic discovery to the defendants on October 29, 2021, and has made supplemental discovery productions on December 10, 2021, January 10, 2022, February 17, 2022, and June 15, 2022. There are no pending discovery requests.

2) Additional Discovery

At this time, the government does not anticipate producing supplemental discovery. The government will provide additional discovery to the defendants if it receives or identifies additional discoverable documents.

3) Timing of Additional Discovery Requests and Motions

The defendants have not submitted any discovery requests to the government to date. The parties propose that the defendants submit any discovery requests no later than Monday, February 6, 2023, and file any discovery motions no later than Friday, March 24, 2023, so that the Court may hear argument on any discovery motions at the status conference proposed in paragraph 10 below.

4) Protective Orders

The Court has entered a protective order in this matter. *See* D.E. 37.

5) Pretrial Motions

The defendants have not filed any pretrial motions under Fed. R. Crim. P. 12(b).

6) Expert Discovery

The parties agree that deadlines for expert disclosures should be established at a later date.

7) Defenses of Insanity, Public Authority, or Alibi

None of the defendants presently intends to assert a defense of insanity, public authority, or alibi.

8) Speedy Trial Act

All time has been excluded under the Speedy Trial Act from the date of the defendants' arraignments through December 13, 2022. The parties request that the time be excluded from December 13, 2022 until the next conference or hearing in this matter.

9) Status of Plea Discussions and Likelihood of Trial

None of the defendants has expressed an intention to plead guilty. The parties estimate that a trial in this matter would last three to five weeks.

10) Next Status Conference

The parties propose that the Court schedule a further status conference for the week of April 24, 2023.

Respectfully submitted,

KINGSLEY R. CHIN

By his attorneys,

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Dated: December 6, 2022

UNITED STATES OF AMERICA,

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CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ David J. Derusha

David J. Derusha

Assistant United States Attorney

Dated: December 6, 2022